

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

RENEE S. WATSON,	)	
	)	No. 1:13-CV-01585-UNA
Plaintiff,	)	
	)	
v.	)	
	)	
CICONTE, WASSERMAN, SCERBA &	)	
KERRICK, LLC and PORTFOLIO	)	
RECOVERY ASSOCIATES, LLC,	)	
	)	
Defendants.	)	

**NOTICE OF DEFENDANT CICONTE, WASSERMAN, SCERBA & KERRICK, LLC'S  
INTENT TO JOIN AND ADOPT DEFENDANT PORTFOLIO RECOVERY  
ASSOCIATES, LLC'S, MOTION TO DISMISS AND  
MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO DISMISS  
PLAINTIFF'S SECOND AMENDED COMPLAINT**

COMES NOW, Defendant Ciconte, Wasserman, Scerba & Kerrick, LLC ("CWSK"), by and through its undersigned counsel, who hereby respectfully provides Notice of CWSK's Intent to Join and Adopt Defendant Portfolio Recovery Associates, LLC's, Motion to Dismiss and Memorandum of Law in Support of its Motion to Dismiss Plaintiff's Second Amended Complaint (the "Motion"), for the reasons outlined in Sections A, B, and C of The Motion, as Plaintiff's claims fail to meet federal pleading standards and fail as a matter of law.

WHEREFORE, Defendant, Ciconte, Wasserman, Scerba & Kerrick, LLC respectfully requests that this Honorable Court grant the Motion and dismiss all claims against CWSK with prejudice.

CICONTE, WASSERMAN, SCERBA &  
KERRICK, LLC

/s/ Daniel C. Kerrick

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*Attorneys for Defendant, Cicone Wasserman,  
Scerba & Kerrick, LLC*

Dated: November 8, 2016